



Marybeth M. Banks
Director

Federal Regulatory Affairs
1850 M Street, N.W., 11th Floor
Washington, D.C. 20036
Telephone (202) 828-7445
Fax (202) 857-1792

EX PARTE OR LATE FILED

April 30, 1997

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

Re: EX PARTE LETTER
CC Docket No. 96-61

RECEIVED
APR 30 1997
Federal Communications Commission
Office of Secretary

Dear Mr. Caton:

In its March 21, 1997 Ex Parte Presentation letter, Sprint informed the Commission about the implementation by local exchange carriers ("LECs") of the Carrier Identification Parameter ("CIP") and the Carrier Selection Parameter ("CSP"). These two parameters taken together will pass information that will allow interexchange carriers to identify calls placed using 10XXX+1 ("casual calls"). Sprint has some additional information regarding these features that it would like to present to the Commission.

If an interexchange carrier wants the capability to distinguish "casual calls" placed using 10XXX+1 from 1+ direct dial calls, it must subscribe to the LECs' CIP optional feature.¹ This feature is available only from end offices which have SS7 signaling capability. There are both recurring charges ("RCs") and nonrecurring charges ("NRCs") associated with the CIP feature. The nonrecurring charges typically include both an order charge and an installation charge. The recurring and nonrecurring charges are applied either on a per trunk or per trunk group basis, depending on the individual LEC. The table below lists the various charges by LEC:

¹ The CSP, which is also required, is provided as a standard feature of the LECs' SS7 service. There is no additional charge for this feature.

No. of Copies rec'd 641
List A B C D E

<u>LEC</u>	<u>NCRs per Trunk Group</u>	<u>NCRs per Trunk</u>	<u>RCs per Trunk Group</u>	<u>RCs per Trunk</u>
AOC	\$ 90		\$ 6	
BA		\$3		\$1
BST		\$3		\$1
NYNEX	\$142		\$ 60	
PacTel	\$ 72		\$ 45	
SWBT	Not Available			
U S West	Not Available			
GTE	\$ 72		\$ 0	
Sprint	\$ 72		\$ 0	
CBT	\$372		\$200	
SNET	\$ 72		\$ 45	

Although many of these charges appear to be relatively small, it must be remembered that they are applied on a per trunk or per trunk group basis and that they rapidly add up. Sprint estimates that it will spend approximately \$3.5 million in NCRs and RCs during the first year it obtains the CIP feature from those LECs offering service as listed above.

Sprint will also need to subscribe to the CIP optional feature from the smaller independents. In many cases, a smaller independent may be connected to the tandem of a larger carrier. If such is the case, Sprint may be required to pay both the tandem owner and the smaller independent for the CIP optional feature.

At this time Sprint does not know the percentage of calls for which it will not receive CIP/CSP information, and thus will not be able to identify the casual calls. As noted in its March 21 letter, two carriers Southwestern Bell and U S West, have not committed to provide CIP. Also, only carriers with SS7 capability will be able to provide the CIP/CSP information. Sprint does not know at this time the percentage of calls placed from offices which do not have SS7 capability. Clearly, however, there will be a substantial percentage of calls for which Sprint and other carriers will not be able to obtain the CIP/CSP information.

In addition to the CIP optional feature charges, Sprint must incur the expense of upgrading its switches to be able to accept the CIP information and to attach it to the call detail record. This upgrade must be purchased from the switch vendor and must be included in a software release.

Sprint would also like to inform the Commission that the bad debt ratio for casual calling billed for Sprint by

the LEC as "Message Ready" billing is approximately 60 percent higher than that of the "Invoice Ready" or "Package Ready" billing which the LEC performs for Sprint. "Message Ready" billing refers to billing the LECs do under contract with Sprint for calls placed by callers who are not Sprint customers; "Invoice Ready" billing refers to billing by LECs for Sprint's customers who receive their Sprint bill together with their LEC bill. Although "Message Ready" billing includes other types of calls in addition to 10XXX (such as LEC calling card calls, collect from a Sprint-presubscribed line to a non-Sprint line, etc.), Sprint believes the bad debt ratio for casual calling is approximately the same as that for the entire category of "Message Ready" billing.

An original and one copy of this letter are being filed.

Sincerely,

Marybeth Parks

c: Melissa Newman
Jordan Goldstein
Christopher Heimann
Susan Launer
Staci Pies